

## LEVIN-EPSTEIN & ASSOCIATES, P.C.

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July 10, 2020

**Via Electronic Filing**

The Honorable Judge Edgardo Ramos  
U.S. District Court Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Ortiz Ochoa et al v. Prince Deli Grocery Corp. et al*  
**Case No.: 18-cv-09417-ER**

Dear Honorable Judge Ramos:

This law firm represents Defendants Prince Deli Grocery Corp. (d/b/a Prince Deli Grocery) and Abdo S. Anam (a/k/a Abdo Saleh) (together, the “**Defendants**”) in the above-referenced action.

Pursuant to Rule 1(E) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend the non-expert deposition completion deadline from July 10, 2020 to, through and including August 31, 2020 (*i.e.*, the current fact discovery completion deadline).

This is the first require of its nature, and is made on consent of Plaintiff. If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the COVID-19 pandemic had impacted the parties’ ability to conduct in-person depositions. Separately, Defendants are awaiting receipt of Plaintiff’s responses and objections to supplemental interrogatories and requests for production of documents, which were served on June 16, 2020. The responses and objections to Defendants’ supplemental discovery requests are necessary before Plaintiff’s deposition can be scheduled.

Thus, Defendants respectfully request that the non-expert deposition completion deadline be extended from July 10, 2020 to, through and including August 31, 2020 (*i.e.*, the current fact discovery completion deadline).

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel